

## JONES DAY

222 EAST 41ST STREET • NEW YORK, NEW YORK 10017-6702  
TELEPHONE: 212-326-3939 • FACSIMILE: 212-755-7306

Direct Number: (212) 326-3721  
sguha@jonesday.com

JP019363  
120349-600001

December 9, 2015

### VIA ECF AND EMAIL

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
One Saint Andrew's Plaza  
New York, New York 10007

Re: United States v. Yankel Rosenthal Coello; S2 13 Cr. 413 (JGK)

Dear Judge Koeltl:

We represent defendant Yankel Rosenthal Coello. We are submitting this letter to set forth a joint proposal by us and the government with respect to a modification of the bail conditions for Mr. Rosenthal set forth in the government's letter to the Court of November 30, 2015 (ECF 28), endorsed by the Court on that same day (ECF 29).

The modification sought here concerns Mr. Rosenthal's [REDACTED]<sup>1</sup>. Pursuant to the bail conditions approved by the Court, [REDACTED] is one of Mr. Rosenthal's relatives who are required to surrender their passports as a condition of Mr. Rosenthal's release from custody. However, as the bail conditions also reflect, the government agreed that it would not unreasonably oppose any request by these relatives for permission to travel internationally for family visits and other appropriate reasons.

We have asked the government, and the government has agreed, that, subject to the approval of this Court, [REDACTED] be permitted to travel [REDACTED] over the winter holidays to visit his family. To that end, and inasmuch as [REDACTED] planned travel is set to begin this coming Sunday, Mr. Rosenthal and the government have agreed that [REDACTED] not be required to surrender his passport now but that he be allowed to take this trip, with the surrender of his passport to occur promptly after his return to this country on January 4, 2016. The government has further agreed that Mr. Rosenthal may be released on bail once he satisfies the remaining conditions despite [REDACTED] retention of his passport during this period.

For the Court's information, the details of [REDACTED] travel are as follows.

---

<sup>1</sup> We will also be filing a redacted version of this letter to avoid needlessly disclosing publicly the name of the co-signer in question or his precise travel arrangements.

NAI-1500695103v2

JONES DAY

The Honorable John G. Koeltl  
December 9, 2015  
Page 2

[REDACTED]

[REDACTED]

We ask that the Court modify the existing conditions of release for Mr. Rosenthal to permit the travel as detailed above, with surrender of [REDACTED] passport postponed until promptly after his return in early January, but no later than January 15, 2016.

Thank you for Your Honor's consideration of this request.

Very truly yours,

*Samidh Guha*  
Samidh Guha

cc: Emil J. Bove III  
Assistant United States Attorney